

Common Voice Northwest

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November 14, 2011

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Renewed Regulatory Framework for Electricity
EB-2011-0379 – Defining and Measuring Performance of
Electricity Transmitters and Distributions
EB-2011-0004 – Promotion of Smart Grid in Ontario

Intent to Participate

In response to the Ontario Energy Board invitation, dated November 8, 2011, to participate in the consultation process that is being initiated by the Board on the renewed Regulatory Framework for Electricity ("RRFE"), Common Voice Northwest (CVNW) is requesting standing as an Interested Party in order to participate in each of the following consultation initiatives:

- EB-2011-0379 – Defining and Measuring Performance of Electricity Transmitters and Distributions, and
- EB-2011-0004 – Promotion of Smart Grid in Ontario

Cost Eligibility Status

Common Voice Northwest is also seeking cost eligibility status in each of the two initiatives

Collaborative Approach in Both Participation and Cost Eligibility

EB 2011 0043

CVNW, in addition to seeking standing as an Interested Party in order to become a participant in EB 2011 0043 – *Regulatory Framework for Regional Planning for Electricity Infrastructure* is also seeking to be granted eligibility for costs for work in relation to-- EB 2011-0043.

CVNW is aware that NOACC has been granted eligibility for costs for work within the limited scope for eligible submissions set out in the Board's decision. CVNW, with the consent of both the NOACC and the Board, will collaborate in preparing a single participant submission in EB 2011 0043. CVNW understands that NOACC is of the same view.

CVNW, however, seeks a broader scope for recovery of costs in its Application for cost eligibility. The broader scope sought by CVNW would include submissions on behalf of industry and not just small business. The Northwest Region is comprised of a many small communities in which local small businesses are largely dependent on a single industrial employer and the employees of that employer. The interests of all in price, reliability and quality of power supply are in concert and not to be differentiated.

CVNW directly represents the interest of its member in the cost-effective development of electricity infrastructure through coordinated planning on a regional basis between licensed distributors and transmitters. The cost responsibility in the respective systems codes are of direct interest to the members of CVNW. The development and growth of electricity assets and the treatment of customers are of direct importance to the CVNW members. CVNW can provide the OEB with clear needs of the consumers it represents with respect to regulated services.

EB 2011-0004

CVNW, in addition to seeking standing as an Interested Party in order to become a participant in EB 2011-0004 - *Promotion of Smart Grid in Ontario*, is also seeking to be granted eligibility for costs for work in relation to EB 2011-0004. In the event that NOACC in making a parallel Application is also awarded cost eligibility for cost recovery, CVNW, with the consent of both the NOACC and the Board, will collaborate in preparing a single participant submission in EB 2011-0004. CVNW understands that NOACC is of the same view.

Again, CVNW seeks a broad scope for recovery of costs in its Application for cost eligibility. The broader scope sought by CVNW would include submissions on behalf of industry and not just small business. The Northwest Region is comprised of a many small communities in which

local small businesses are largely dependent on a single industrial employer and the employees of that employer. The interests of all in price, reliability and quality of power supply are in concert and not to be differentiated.

CVNW directly represents its members in the promotion of the smart grid and seeks to participate in discussion regarding its regional implementation and regulatory framework. The integration of renewable energy into the distribution system; modernization and improvements to the grid; and developing evaluation criteria for regulated services is what CVNW primarily represent on behalf of its members.

Background

CVNW is a movement toward unified action by the citizens of Northwestern Ontario to chart their own course within the Province and the Country by addressing regional challenges with realistic Northern solutions.

The Northwest Region is a distinct geographic, economic and social space within Ontario. The challenges it faces are different from elsewhere in Ontario and the contributions the Northwest Region makes to the Province are unique. The decisions affecting the Northwest Region are best understood and made by those who live in the Northwest Region and who own, operate or are employed by businesses here in the Northwest Region.

To be heard clearly by the other regions of the Province, Northwestern Ontario operates as consensual union that speaks clearly on common areas interest. This Common Voice includes area business, industry, labour, municipalities, and areas without municipal organization, schools, post secondary institutions, multicultural organizations and development agencies.

The role of Common Voice Northwest is to ensure that, to the best of our ability, and through co-operation with all within the Region, the people of the Northwest become more advantaged than they are today. Common Voice Northwest will identify, promote and develop economic opportunities in and for Northwestern Ontario. It will also enter into a dialogue with all residents and interest groups of the Region to determine those projects that should be undertaken as a priority.

Reliability of power supply is one of the most fundamental needs in the entire Northwest Region. Availability of adequate and secure supply of electricity within the Northwest region requires regional planning based on a sound knowledge of the needs and challenges unique to the Northwest Region

Common Voice Northwest has a track record of engaging the expertise of regional leaders within the energy industries. These leaders have formed into Energy Task Forces to identify the issues and create action plans.

Membership

CVNW is a not for profit organization made up of the broad leadership of the Northwest. It includes Municipal and Business representatives (from Northern Ontario Municipal Association and NOACC) but also includes organized labour (including the Thunder Bay District Labour Council & CEP), post secondary education (Lakehead University and Confederation College), school boards (Northern Education Leaders), multicultural associations, Townships without Municipal Organization (TWOMO), Northwestern Ontario Development Network (observer), North of Superior Workforce Planning Board. We also keep the three Treaty Organizations informed of our activities (NAN, Treaty 3 and Robinson Superior).

Objects

CVNW is a corporation, duly incorporated in the Province of Ontario with the following objects:

The establishment and operation of an organization for the following purposes including:

- a) To provide a forum for the consideration of electricity matters of common interest to the citizens of Northwestern Ontario;
- b) To bring interested parties together to promote and advance the interests of the citizens of Northwestern Ontario with respect to electricity policy and its regulatory framework;
- c) To co-ordinate and communicate a common message regarding matters where the rights and resources of people in Northwestern Ontario are affected; and
- d) To provide leadership on the electricity issues and its policies affecting all people in Northwestern Ontario.

Cost Awards

CVNW seeks designation as a person, under Section 30 of the *Ontario Energy Board Act, 1998*, eligible to receive costs. The basis for the designation would be the representative nature of the CVNW in the Northwest Region itself and the indicated collaboration that the CVNW will continue to pursue with other Interested Parties representing the interests of the Northwest Region.

CVNW in combination with NOACC in particular represents the direct interest of ratepayers, especially the small businesses, throughout the Northwest Region. Those ratepayers are often dependent for their livelihood on a single industrial employer in a town. They depend also on the robust mineral exploration programs now operating in the Northwest Region. The development of a reliable electricity system in the Northwest Region is essential for the viability of those industrial plants, for advanced mineral exploration, value added forest industries and certainly for the construction and operation of any mine that reaches production. A reliable,

affordable and quality supply of electricity is a necessity for economic wellbeing of the entire region.

Adequate supply of energy is also essential for an appropriate standard of living in the municipal and First Nation communities throughout the Northwest Region.

CVNW represents a public interest in seeking to ensure the adequacy and security of electricity supply for both the ratepayers in the Northwest Region and the industries that employ them.

Representing CVNW:

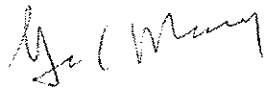
For purposes of Notice:

- Dr. George Macey, President, gmacey@shaw.ca; and
- Mr. Iain Angus, Executive Director, iangus@thunderbay.ca

Please contact the undersigned or Mr. Iain Angus should further information or clarification be required.

Respectfully submitted,

Yours truly



George Macey
Chair